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*Attorneys for Defendant  
Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**OTTO TRUCKING'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS OPPOSITION TO  
WAYMO'S MOTION TO EXCLUDE  
OTTO TRUCKING'S DAMAGES EXPERT  
JAMES MALACKOWSKI**

Courtroom: 8 (19th Floor)  
Judge: Hon. William Alsup  
Trial Date: October 10, 2017

Filed/Lodged Concurrently with:  
1. Declaration of Neel Chatterjee  
2. [Proposed] Order  
3. Redacted/Unredacted Versions  
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this Administrative Motion to File Under Seal Portions of Its Opposition to Plaintiff Waymo LLC’s Motion to Exclude Otto Trucking’s Damages Expert James Malackowski Pursuant to Rule 702 and *Daubert* (the “Opposition”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Parties
Opposition	Highlighted portions	Otto Trucking (blue) Waymo (green)
Exhibit 1 to Chatterjee Declaration	Highlighted portions	Otto Trucking (blue) Waymo (green)
Exhibit 2 to Chatterjee Declaration	Entire Document	Otto Trucking

The above referenced portions of the Opposition, and Exhibits 1 and 2 to the Chatterjee Declaration highlighted in blue contain highly confidential, sensitive business information of Otto Trucking relating to terms of Otto Trucking’s agreements, corporate structure, and financial information. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. If this information were made public, Otto Trucking’s competitors and counterparties would have insight into how Otto Trucking structures its business, allowing them to modify their own business strategy. Otto Trucking’s competitive standing could be significantly harmed.

The above referenced portions of the Opposition, and Exhibits 1 and 2 to the Chatterjee Declaration highlighted in green contain information that Waymo has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5. 4. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

Otto Trucking's request to seal is narrowly tailored to those portions of the Opposition and its supporting documents that merit sealing.

Dated: September 22, 2017

Respectfully submitted,

By: /s/ Neel Chatterjee

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on September 22, 2017. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 22nd day of September in Menlo Park, California.

/s/ Neel Chatterjee  
Neel Chatterjee